

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v -

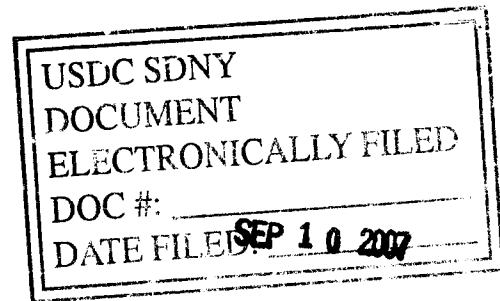
ALEX LUKOV,
a/k/a "Oleg,"
a/k/a "Alex Lukovos,"

Defendant.

07 CRIM 850

INDICTMENT

07 Cr. 850 (RJS)



COUNT ONE

The Grand Jury charges:

1. From in or about June 2005 up to and including in or about January 2006, in the Southern District of New York and elsewhere, ALEX LUKOV, a/k/a "Oleg," a/k/a "Alex Lukovos," the defendant, and others known and unknown, unlawfully, wilfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Title 18, United States Code, Sections 1341 and 1343.

2. It was a part and an object of the conspiracy that ALEX LUKOV, a/k/a "Oleg," a/k/a "Alex Lukovos," the defendant, and others known and unknown, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses,

representations and promises, for the purpose of executing such scheme and artifice and attempting so to do, unlawfully, willfully and knowingly would and did place in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the Postal Service, and would and did take and receive therefrom, such matters and things, and would and did knowingly cause to be delivered by mail according to the direction thereon, and at the place at which it was directed to be delivered by the person to whom it was addressed, such matters and things, in violation of Title 18, United States Code, Section 1341.

3. It was further a part and an object of the conspiracy that ALEX LUKOV, a/k/a "Oleg," a/k/a "Alex Lukovos," the defendant, and others known and unknown, unlawfully, willfully and knowingly would and did devise a scheme and artifice to defraud, and to obtain money and property by means of false and fraudulent pretenses representations and promises, and for the purpose of executing such schemes and attempting to do so, would and did transmit and cause to be transmitted by means of wire and radio communication in interstate and foreign commerce, writings, signs, signals, pictures and sounds, in violation of Title 18, United States Code, Section 1343.

MEANS OF THE CONSPIRACY

4. It was a means of the conspiracy that ALEX LUKOV,

a/k/a "Oleg," a/k/a "Alex Lukovos," the defendant, submitted, caused to be submitted, and aided and abetted others to submit, false financial information to lending institutions and others in order to procure loans for the purchase of residential real estate.

OVERT ACTS

5. In furtherance of the conspiracy, and to effect the objects thereof, ALEX LUKOV, a/k/a "Oleg," a/k/a "Alex Lukovos," the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. In or about September 2005, ALEX LUKOV, a/k/a "Oleg," a/k/a "Alex Lukovos," caused materially false statements to be made and used in connection with another individual's application for a mortgage loan for the purchase of a property in Sullivan County, New York.

b. On or about October 28, 2005, LUKOV attended a real estate closing in Brooklyn, New York for the purchase of a property located in Sullivan County, New York.

c. On or about October 28, 2005, LUKOV caused a form to be sent by facsimile from Brooklyn, New York to a representative of a lending institution who was located in California.

d. On or about December 30, 2005, LUKOV caused a

mortgage for a property located in Sullivan County, New York to be sent by the Postal Service from Brooklyn, New York to California.

(Title 18, United States Code, Section 1349.)

COUNT TWO

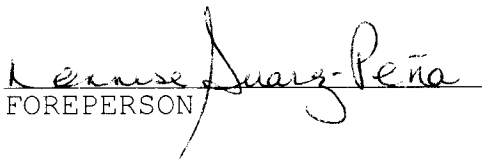
(Wire Fraud re: 330 Old Tacy Road, Kauneonga Lake, New York)

The Grand Jury further charges:

6. In or about October 2005, in the Southern District of New York and elsewhere, ALEX LUKOV, a/k/a "Oleg," a/k/a "Alex Lukovos," unlawfully, willfully, and knowingly did devise a scheme and artifice to defraud and to obtain property by means of false and fraudulent pretenses and representations, to wit, a scheme to obtain home mortgage and/or equity loans totaling approximately \$475,000 for a property in Sullivan County, New York, by, among other things, submitting and causing to be submitted to BNC Mortgage Company documents containing false representations and material omissions about, among other things, the mortgage applicant's employment and income and interest in the property, and did transmit and cause to be transmitted by means of wire and radio communication in interstate commerce, a writing, sign, signal, picture and sound, to wit, LUKOV caused to be submitted documents by interstate facsimile and other means, including a facsimile on or about October 28, 2005 from Brooklyn,

New York to a representative of BNC Mortgage Company in California.

(Title 18, United States Code, Sections 1343 and 2.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

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Defendant.

INDICTMENT

07 Cr.

(Title 18, United States Code,
Sections 1341, 1343, 1349 and 2.)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL

Dennise Suarez-Peña
Foreperson.
Dennise Suarez-Peña

*Indictment Filed, case
assigned to Judge Sullivan
J. Maas, USMJ*

*RL
9/10/07*